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BLM WESTERN PLAN REVISIONS  
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DEAR WOPR COMMITTEE:

We are totally opposed to the BLM's preferred alternative #2 for management direction of BLM lands in western Oregon. We urge the adoption of the NO ACTION alternative instead. The BLM should not withdraw from the Northwest Forest Plan but instead continue interagency coordination both among local field units as well as at the policy level. Under WOPR it's obvious that the BLM would lose the large scale, long term view of the land for the sake of "getting the cut out".

Several of our most serious concerns are:

- 1) Maintain a NO CUT policy for all BLM public lands old growth forest reserves. Please, old growth forests are much more valuable left standing than as logs in some local mill which will give only a temporary boost to the local economy. Left standing they provide much needed habitat for a number of endangered species as well as act as a filter for pure water, reduce erosion, provide a net carbon sink and are useful for many types of recreation. THE BLM MUST RECOGNIZE THAT THE SCARCE RESOURCE IS NOT SPOTTED OWLS, MARBLED MURRELETS OR ANY OF THE OTHER PLANT AND ANIMAL SPECIES DEPENDENT ON OLD GROWTH. THE SCARCE RESOURCE IS THE OLD GROWTH ECOSYSTEM ITSELF!

The Preferred Alternative 2 would decrease protection of old growth forests and aquatic habitats.

The proposed clearcutting and replanting schedule will NOT meet the test of "sustained even flow non-declining yield" as required by the O & C Act. It appears there are unacknowledged uncertainties and over optimistic assumptions about the regrowth of tree farms in a warming climate. Abandoning the Northwest Forest Plan and reducing late successional reserves by 47% is outrageous and will definitely negatively impact old growth dependent R&E species.

- 2) Stream buffers: The WOPR endorses over 1000 miles of new road and radically reduced stream buffers, without a rigorous analysis of the harm to drinking water supplies and salmon habitat. Western Oregon BLM lands contain more than 20,000 miles of rivers and streams and more than 218,000 acres of lakes, ponds and wetlands, providing clean water, wildlife habitat and recreational opportunities. The WOPR would drastically reduce protections for these riparian areas as well as log over 200,000 acres of currently protected streamside forests. Current buffers protect water sources from some negative impacts of logging. Under the WOPR these buffers would be

reduced to 25 ft. or in many instances get rid of them altogether. These new proposed regulations are well below scientifically recognized buffers for minimizing problems with aquatic resources, landslides and floods. And BLM lands produce drinking water for tens of thousands of residents in 76 communities across Oregon.

- 3) We are totally opposed to the designation of any new "OHV Emphasis Areas". OHV's create an incredible amount of noise and air pollution and the damage to environmentally sensitive areas caused by irresponsible riders can be significant. And OHV use (projected to increase at an annual rate of 2.3%) is NOT compatible with "quiet type" forest land recreational activities (projected to increase 27% annually) such as hiking, fishing, hunting, camping, rock climbing and wildlife viewing, all of which are becoming more popular every year. OHV's do not belong on our public lands!

Elimination of BLM forest reserves as established by the Northwest Forest Plan is a likely violation of the Endangered Species Act and Clean Water Act. In the strictest sense, it's obvious the WOPR is really a political document used by the Bush administration as one way to pay back Oregon timber companies for the millions of dollars they have contributed to the Bush political machine and the Republican Party. This is no way to manage our valuable public forest lands. I urge the BLM to scrap the WOPR and remain under the Northwest Forest Plan, protect all remaining old growth ecosystems and manage for even flow SUSTAINED yield of timber from the thousands of acres of existing plantations.

In summary, the BLM, by withdrawing from the Northwest Forest Plan and placing timber above all other resource values, will abandon scientific management of our public lands, embrace legally questionable management decisions and reignite the timber wars of the 1980's and 90's. Late successional reserves will be reduced by 47%, streamside buffers by 57%; current logging levels tripled and a seven fold increase in logging forests older than 200 years. Finally, the BLM should emphasize forest restoration as the best way to ensure community stability. BLM can meet the social and economic objectives of the O&C Act by focusing their efforts on forest restoration, including thinning dense young tree farms that were established following clearcutting. This will help meet the restoration objectives of the Northwest Forest Plan, while also creating jobs and producing woods projects.

Thank you for the opportunity to comment on the WOPR.

Sincerely,

John O. Koenig  
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